

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>BK. No. 17-16142 ELF</b>
<b>LISA NGUYEN</b>	:	
<b>Debtor</b>	:	<b>Chapter No. 13</b>
	:	
<b>MARK KNOUSE</b>	:	
<b>LYNN BRINKER</b>	:	
<b>KIM BEIDLER</b>	:	
<b>Movants</b>	:	<b>11 U.S.C. § 362</b>
<b>v.</b>	:	
<b>LISA NGUYEN</b>	:	
<b>Respondent</b>	:	

**NOTICE OF MOTION, RESPONSE DEADLINE,  
AND HEARING DATE**

TO: DEBTOR, THE UNITED STATES TRUSTEE, RULE 2002 PARTIES, ALL CREDITORS AND PARTIES IN INTEREST, NOTICE IS GIVEN THAT:

Mark Knouse, Lynn Brinker, and Kim Beidler, by and through their undersigned counsel, Bielli & Klauder, LLC, has filed a *Motion for Relief from Automatic Stay* (the “Motion”) with the Court to permit them to foreclose on 238 Keswick Avenue, Glenside, PA 19038.

**Your rights may be affected.**

**You should read these papers carefully and discuss them  
with your attorney, if you have one in this bankruptcy case.  
(If you do not have an attorney, you may wish  
to consult with an attorney.)**

1. If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before **December 22, 2017**, you or your attorney must do **all** of the following:

(a) file an answer explaining your position at

UNITED STATES BANKRUPTCY COURT  
CLERK'S OFFICE  
900 MARKET STREET, STE 400  
PHILADELPHIA, PENNSYLVANIA 19107-4299

If you mail your answer to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movants' attorney:

Thomas D. Bielli, Esquire  
Nella M. Bloom, Esquire  
1500 Walnut St., Ste. 900  
Philadelphia, PA 19102

2. If you or your attorney do not take steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the Report.

3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank, Bankruptcy Judge, on **January 2, 2018 at 9:30 a.m. prevailing Eastern time** in Courtroom No. 1, United States Bankruptcy Court, 900 Market Street, 2nd Floor, Philadelphia, Pennsylvania 19107.

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

**BIELLI & KLAUDER, LLC**

Date: December 8, 2017

/s/ Thomas D. Bielli  
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*Counsel for Mark Knouse, Lynn Brinker, and Kim Beidler*